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Counsel for Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, Kimberly Yvette Smith, M.D., a/k/a Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., and Richard Strauss, M.D.

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND
COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

All New Jersey Cases

MDL No. 2419

Docket No. 1:13-md-2419 (RWZ)

**PREMIER ORTHOPAEDIC AND SPORTS MEDICINE ASSOCIATES OF
SOUTHERN NEW JERSEY, LLC, et. al's NOTICE OF TEN DAY EXTENSION TO
FILE OPPOSITION TO INSPIRA MEDICAL HEALTH NETWORK, INC. AND
INSPIRA MEDICAL CENTERS, INC.'S MOTION FOR PROTECTIVE ORDER [DKT
NO 2000], CONSENT FOR THE MOVING PARTY TO FILE A REPLY BRIEF, AND
REQUEST FOR ORAL ARGUMENT ON 8/5/15**

The Premier Defendants file this notice of ten-day extension, pursuant to MDL Order No. 11 (Dkt. No.: 1524), to respond in opposition to Inspira Health Network, Inc. and Inspira Medical Centers, Inc.'s (collectively, "Inspira") Motion for Protective Order [Dkt. No. 2000] (hereinafter

“the motion”). Inspira, the moving party, has agreed to allow the Premier Defendants an additional ten days to file an opposition to the motion. Accordingly the new deadline for the filing of the Premier Defendants’ opposition is July 16, 2015.

The Premier Defendants have also agreed to allow Inspira to file a reply brief in response to the Premier Defendants opposition. Accordingly, the Premier Defendants consent and will not object to Inspira seeking leave of court to file a reply to the Premier Defendants opposition pursuant to D. Mass. Local Rule 7.1(b)(3).

Respectfully submitted,

Blumberg & Wolk, LLC

By: /s/ Christopher M. Wolk, Esq.

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CERTIFICATE OF SERVICE

I, Christopher M. Wolk, hereby certify that this document has been filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on this date.

Date: July 6, 2015

/s/ Christopher M. Wolk, Esq.